

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

In re CASSAVA SCIENCES, INC.	)	Originating No. 1:21-cv-00751-DAE (W.D.
SECURITIES LITIGATION	)	Tex.)
<hr/>	)	
	)	CLASS ACTION
This Document Relates To:	)	
	)	PLAINTIFFS' MOTION TO COMPEL THE
ALL ACTIONS.	)	PRODUCTION OF DOCUMENTS
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PLEASE TAKE NOTICE that lead plaintiff Mohammad Bozorgi and additional plaintiffs Ken Calderone and Manohar Rao (collectively, “Plaintiffs”), hereby move this Court for an order compelling the production of documents in compliance with their document subpoena served on non-party Quanterix Corp. located in this District.

This motion is based upon the accompanying memorandum of law in support thereof, the declaration of Kevin A. Lavelle, and such other evidence and argument as the Court may consider.

**REQUEST FOR ORAL ARGUMENT**

Plaintiffs respectfully request oral argument pursuant to Local Rule 7.1(d) of the United States District Court for the District of Massachusetts. Plaintiffs believe that oral argument will assist the Court’s consideration of this motion, and they would appreciate the opportunity for counsel to address any issues raised by, or questions posed by, the Court.

DATED: February 1, 2024

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MANDELCORN, LLP  
THEODORE M. HESS-MAHAN (BBO  
#557109)

*s/ Theodore M. Hess-Mahan*  
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Counsel for Additional Plaintiff Manohar K. Rao

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)**

I hereby certify that on January 11, 2024, Plaintiffs' counsel conferred with Quanterix's counsel regarding the Motion to Impound, and on January 12, 2024, Quanterix informed Plaintiffs that the documents at issue should be subject to the Motion to Impound.

/s/Theodore M. Hess-Mahan  
Theodore M. Hess-Mahan

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on February 1, 2024, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Theodore M. Hess-Mahan

THEODORE M. HESS-MAHAN (BBO #557109)

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**DECLARATION OF SERVICE**

I, Theodore M. Hess-Mahan, not a party to the within action hereby declare that on February 1, 2024, I caused to be served the foregoing document by email on the parties to the within action, addressed as follows:

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I declare under penalty of perjury that the foregoing is true and correct. Executed on February 1, 2024, at Wellesley Hills, Massachusetts.

*s/ Theodore M. Hess-Mahan*  
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 THEODORE M. HESS-MAHAN